
COUNTY OF KERN

MEMO

Waste Management

To: Cal EPA
From: Lyn Beurmann, Tony Bonanno & Jaimy Jackson,
Waste Management Specialists
Subject: Request for comments on E-waste
Date: January 9, 2003

Please accept our comments regarding the design of an E-waste Collection System for the State of California.

Background

The County of Kern (County) encompasses 8,072 square miles and has a population of approximately 650,000. The County consists of unincorporated rural areas and 11 incorporated municipalities, most of which are isolated by vast regions of valley, desert, and mountain areas.

The County operates 18 Landfills, 6 Transfer Stations and 4 Bin Sites. In addition, we have one Permanent Household Hazardous Waste Collection Facility (PHHWCF). This Facility collects waste from County residents, Conditionally Exempt Small Quantity Generators (CESQG's) and conducts Temporary One Day Collection Events in outlying areas of the County.

Currently, the County is collecting CRT's at landfills and the PHHWCF is an unadvertised drop off location. The program will be expanding within the next 30 days, although a hiring freeze has just been announced by the Board of Supervisors.

CONCERNS

- How are E-wastes tested to determine what is hazardous? Does the testing criterion which determines whether or not a waste is hazardous represent what actually happens at a landfill? Does the State Standard take into consideration there are locations in Northern California that may get 90" of rain per year while other areas in the State receive 1-3" per year?
- New landfill liner standards greatly reduce potential for groundwater contamination, Therefore, why can't E-waste be a designated waste going only to lined Class III landfills?
- If it is determined that everything that plugs into a wall is hazardous in the State of California, what kind of marketing disadvantages will companies have and how much will it cost consumers? How will it affect Thrift Stores such as the Good Will and Salvation Army who support their programs by Reusing discarded items which are still good?

- There has been much discussion about environmental health and safety concerns such as preventing contamination of groundwater. What about OSHA Health & Safety concerns such as workers backs and knees that could be injured from lifting these bulky items day after day? These items require human handling up to the point they are palletized and placed into trucks. If the CRT's are going directly into a roll-off container, many of which do not allow entry by a forklift, the work of loading and unloading the roll-off requires people to lift each item. OSHA has announced it is rolling out more stringent ergonomics rules and Congress is working with them to keep these regulations on the front burner (S.2184).
- There are also concerns about the use of prison labor. Will they have adequate training and Personal Protective Equipment to alleviate potential lawsuits?
- Where will E-wastes go for disposal once everything that can be reused is taken? We know they can't go overseas, but should we be sending them to our neighbors in Utah or Texas? Shouldn't the State of California take responsibility for the disposal of waste they have deemed to be hazardous?
- Where is the money coming from? State and local budgets are depleted. Kern County has an indefinite hiring and budget freeze.
- Do we really want the State to collect money for each E-waste item sold thereby creating another big pool of money that has to be administered by government? Too much room for waste! Grants are ok, but they cost tax payers too much money and cause grantees inordinate amounts of work preparing reports for reimbursement.

SUGGESTIONS

- Manufacturers should be responsible for their products cradle to grave. This approach would encourage manufacturers to redesign the electronics they produce to be easier to reuse, upgrade, etc. In this system, the consumer would pay for the life of the product based upon how many they use. This would eliminate the tax payer covering the cost for disposal of electronics used by others. The manufacturer could have an agreement with one or more entities to collect, reuse, recycle or dismantle their products based upon how they choose to meet the State E-waste Program Criteria. The manufacturer would attach a bar code to each item. When the collector/dismantler/recycler receives the item, they scan the bar code and send the E-waste from that manufacturer back to them. The collector/dismantler/recycler sends a list of scanned items to the manufacturer quarterly or annually. The Manufacturer sends a rebate check to the collector/dismantler/recycler for the agreed upon unit price for collection, handling, shipping etc. There are lots of details to address, such as what if someone brings an item from a manufacturer that the collector does not have an agreement with? If the State used the Special Seal Mr. Lowry talked about for those manufacturers who participate in the program these details could be worked out.
- State and Local governments should have agreements to purchase electronic items from only those that participate in the Statewide E-waste Program. This should include upgrades for computers so government entities are not disposing of thousands of computer systems.